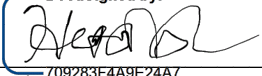


6. I was working from Napoli's NYC office when I received the results from the employee survey wherein an anonymous employee complained, *inter alia*, that Napoli acquiesces to its clients' and attorneys' racist and aggressive conduct toward minority employees.
7. I was also in New York City during the sham mediation in which Napoli fraudulently begged me not to file a lawsuit in order to gain time to file a pre-emptive retaliatory lawsuit against me.
8. Many of the cases I worked on while I was employed at Napoli were litigated in NYC courts and I was often in NYC for appearances, depositions, client meetings and the like.
9. Prior to requesting medical leave on February 13, 2023, I worked over 1,250 hours at Napoli in the last calendar year.
10. The above is not a complete recitation of my work in NYC, nor is it a complete statement of the reasons my lawsuit has an impact in NYC. However, the above are representative examples.

I declare under penalty of perjury that the foregoing is true and correct.

DocuSigned by:

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Heather Palmore

08/11/2023 | 3:06 PM PDT
Date